



**U.S. Department of Justice**

United States Attorney  
District of New Jersey  
*Civil Division*

RACHAEL HONIG  
ACTING UNITED STATES ATTORNEY

*Enes Hajdarpasic*  
Assistant United States Attorney

970 Broad Street, Suite 700  
Newark, NJ 07102  
[enes.hajdarpasic@usdoj.gov](mailto:enes.hajdarpasic@usdoj.gov)

main: (973) 645-2700  
direct: (973) 297-2046  
fax: (973) 297-2010

January 6, 2021

**BY ECF**

Honorable Michael A. Hammer  
United States District Court  
for the District of New Jersey  
Martin Luther King, Jr., Fed'l Bldg. & U.S. Cthse.  
Newark, NJ 07101

Re: *W.A.O., et al. v. Kenneth T. Cuccinelli II et al.*  
Case 2:19-cv-11696-MCA-MAH

Dear Judge Hammer:

This office represents Defendants in this matter. My office is currently in communication with Plaintiffs' counsel regarding a possible resolution of this matter. However, additional time is needed to confer with Plaintiffs about the terms of a possible resolution. Moreover, my office will need additional time to communicate with U.S. Citizenship and Immigration Services regarding a possible settlement. Therefore, my office respectfully requests a 45-day extension of the deadline to file an answer or otherwise move. Plaintiffs' counsel does not object to this extension request. A proposed order of extension is attached to this letter. Thank you for the Court's consideration of this matter.

Respectfully submitted,

RACHAEL HONIG  
Acting United States Attorney

By: *s/ Enes Hajdarpasic*

ENES HAJDARPASIC  
Assistant United States Attorney

CC: Counsel of Record by ECF